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October 10, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza
Courtroom 1020
Brooklyn, NY 11201-1804

Re: Superb Motors Inc., et al. v. Deo, et al.
Case No.: 2:23-cv-6188 (OEM) (JMW)

Dear Judge Wicks:

This firm represents Plaintiffs Superb Motors Inc. (“Superb”), Team Auto Sales LLC (“Team”), and Robert Anthony Urrutia (“Urrutia”) (Superb, Team, and Urrutia collectively the “Superb Plaintiffs”) in the above-referenced case.

The Plaintiffs and all Defendants – except for those represented by Harry R. Thomasson, Esq. (“Thomasson”) – respectfully submit this cover letter enclosing the parties’ proposed discovery plan consistent with this Court’s Initial Conference Scheduling Order dated September 28, 2023. See ECF Docket Entry 54.

Yesterday, your undersigned submitted a proposed discovery plan to all counsel of record and provided available times today to join a conference to review same. All counsel, including Thomasson, responded with availability at 4:00 PM.

At 4:00 PM today, all counsel – except Thomasson – joined. At 4:05 PM, I wrote to Thomasson with all counsel copied providing him with the dial-in number. Having not joined, the parties proceeded with reviewing the proposed discovery plan and respectfully submit what they have agreed to.

In light of these circumstances, the Plaintiffs respectfully submit that the proposed schedule be entered as agreed to by all parties who appeared for the telephonic meet-and-confer.

The Plaintiffs thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
October 10, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

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Enclosure.

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